

DECLARATION OF NANCY RODES

I, Nancy Rodes, declare:

1. I was a Scientologist for several years until 1979. I have also been known as Nancy Dincalci, and used that name when I testified in 1984 at the trial of Gerald Armstrong before Judge Breckenridge in Los Angeles Superior Court. In December 1986 I entered into an agreement with various Scientology-related entities, hereinafter referred to as "the organization," to settle my claims against the organization. I was represented in the settlement by attorney Michael J. Flynn of Boston, Massachusetts who also represented the approximately twelve other claimants who participated in the December 1986 settlement

2. I was required by the settlement agreement to not assist anyone involved in litigation against the organization, and to not make myself amenable to service of process.

3. I have also agreed to keep secret the contents of the settlement agreement.

4. I do not believe this declaration assists anyone involved in litigation against the organization any more than it assists the organization itself.

5. I believe I should make public the fact that I must act to avoid service of process and not assist litigants against the organization because I consider these conditions obstructive of justice.

6. The contents of the settlement agreement do not contain any conditions regarding future conduct that are not reciprocal,

and thus that unilaterally favors the organization. My understanding of the meaning and effect of the settlement agreement does not include the concept that the organization can say whatever it wants about me from its knowledge of my history, whereas I must remain silent in the face of such statements.

7. During none of my conversations with Mr. Flynn at the time of the settlement, nor at any time, did he say or imply that the settlement agreement was enforceable. Because of my concerns, however, that the organization may use intimidation and harassment against perceived enemies, I have attempted to live by the agreement.

I declare under the penalty of perjury under the Laws of the State of California that the foregoing is true and correct.

Executed this 3rd day of March ¹⁹⁹² at Oakland, California.


Nancy Rodes